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ABSTRACT

The lowering of the age of majority to 18 years has had a variety of ramifications for higher education. A discussion of the more obvious of these from a legal as well as practical standpoint is presented. The areas outlined include the demise of "in loco parentis"; residency and out-of-state tuition; dormitory residence requirements; student records and reports to parents; financial support for students; tort liability; and campus activities. (JMF)

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Ramifications Of The Age Of Majority

Prepared for the Council of Student Personnel Associations in Higher Education

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RAMIFICATIONS OF THE AGE OF MAJORITY

I. INTRODUCTION

Pressure has been mounting in recent years to lower the age of majority from the traditional age of 21 to 18. Eighteen year olds have long been able to vote in some states, and the fact that they have been required to serve in the armed forces has given much credence to the argument that they should be accorded legal adult status.

The age of majority is legally defined as "the age at which, by law, a person is entitled to the management of his own affairs and to the enjoyment of civic rights. The opposite of minority."[1] This means that once a citizen reaches this age he is of full legal age "at which the person acquires full capacity to make his own contracts and deeds and transact business generally."[2] Legal age may be partial in that a person may be of legal age for certain purposes (marriage, for example) before arriving at the age of majority or full legal age. It should be pointed out that it is the prerogative of each state to determine what the age of majority will be. Although states can and do vary as to what the age of majority may be, it must be remembered that the Federal Constitution guarantees certain rights to all citizens, regardless of age. Probably the most significant of these rights are found in the first ten amendments, known as the Bill of Rights, and the due process and equal protection clauses of the Fourteenth Amendment.

The move toward lowering the age of majority in this country was accelerated greatly by the ratification of the Twenty-sixth Amendment to the Federal Constitution which gave 18 year olds the right to vote in both state and federal elections. As a result, legal adult status is now accorded to those under 21 in a plurality of states. Within the past several years, at least 22 states have lowered the age of majority to 18.

This change has many ramifications for higher education. Instead of the majority of students being minors, colleges are filled with practically all adult students. This inherently causes both the student and the institution to have a different perspective than was formerly held. Aside from the lessening of in loco parentis applications, other ramifications include residency as related to out-of-state tuition, dormitory residency requirements, student records, student financial support, and tort liability. It is reasonable to say that almost all aspects of higher education may be affected either directly or indirectly by this change.

The purpose of this paper is to explore the more obvious ramifications resulting from the lowering of the age of majority. An attempt has been made to discuss them from a practical standpoint as well as from a legal stance.

II. DEMISE OF IN LOCO PARENTIS

The concept of in loco parentis[3] no longer has valid legality in higher education. A virtual floodtide of court cases[4] has been handed down which affirms the rights of students and which furthers the demise of the doctrine of in loco parentis. However, the death of long-held concepts and traditions is a slow and painful process. While many colleges and universities may well accept the fact that in loco parentis is legally dead, there is still a built-in resistance to completely abandoning it.

Administrators in higher education are not entirely to blame for this reluctance, for they are well aware of societal pressures which may call for the continued reliance upon the doctrine. On the other hand, court decisions have caused an awareness among administrators that they are liable for their actions and as a result many, if not most, do not relish the acceptance of the responsibilities which attach to the in loco parentis doctrine.

With the lowering of the age of majority, practically all college students will be adults, a fact which should completely seal the doom of in loco parentis (according to a strict interpretation of the concept). Certain humanitarian features of that concept such as the willingness to assist students in any way possible in order to meet their needs as human beings will and should remain. But the legal relationship between the student and the institution will best be described as one which encompasses a combination of the various theories including contract, fiduciary, constitutional, and in loco parentis, insofar as the humanistic aspect is concerned.

Students will be forced to accept the responsibilities which their newly acquired adult status entails. They can then sue and be sued. They will have a degree of awareness of their rights and responsibilities that was not present or needed before their new found status.

The lowering of the age of majority may well be a major factor leading to the elimination of many student personnel functions which border upon "in loco parentis". Examples of these functions include the supervision of student activities, fraternities, and sororities. The elimination of the sponsorship of student publications is already underway in some institutions. Others are turning away from the practice of officially recognizing student organizations. Lewis Mayhew goes so far as to suggest that the elaborate system of dean of student organizations, directed activities, and directors of counseling, testing, guidance, housing, and health services will probably become obsolete in the future.[5]

III. RESIDENCY AND OUT-OF-STATE TUITION

Probably the most significant ramification of the lowering of the age of majority is the question of "residency" of a student

relative to out-of-state tuition charges. Since a lowering of the age of majority to 18 will classify almost all college students as adults, they may be able to obtain a legal residence in the state where they attend college and thereby avoid the higher out-of-state tuition payments.

In order to obtain a legal residence, a student must show that his domicile is indeed located within the state. "Domicile" is defined as "that place where a man has his true, fixed and permanent home and principal establishment, and to which, whenever he is absent, he has the intention of returning."[6]

A student's place of residence is not to be confused with his domicile. Residence is defined as "a factual place of abode, living in a particular locality."[7] Residence simply requires that a person be bodily present as an inhabitant in a particular place, while domicile requires, in addition to bodily presence in that place, an intention to make it one's fixed and permanent home. Throughout this paper, the "legal residence" of a student is considered his "domicile."

The ability to gain legal residence in a state has tremendous ramifications insofar as finances are concerned. Out-of-state tuition may be eliminated in a great many instances if a student is able to obtain a legal residence in the state in which the college or university is located.[8] If students can easily gain legal residence status and the out-of-state tuition is therefore eliminated, then the financial loss to the institution will have to be compensated by other means. Tuition fees will probably be higher, and this will tend to limit educational opportunities within a state for many who may not be able to afford the increased costs.

There are basically two questions which must be considered by the courts in residency cases involving out-of-state tuition. The first question is whether a state may charge an additional fee to students who are not legal residents of that state. The second question goes a step further and seeks to determine whether a student can gain, for tuition purposes, a legal residence while in attendance at the college or university, or whether he must either establish his legal residence in the state prior to enrollment or drop out of school in order to establish his domicile.

There have been many court cases decided concerning the residency status of students for tuition purposes. Several recent decisions have centered upon the basic questions concerning the legality of out-of-state tuition fees imposed upon students who are legally non-residents of the state.

The Supreme Court of Arizona[9] held that the Board of Regents' policy requiring that a student maintain a "legal residence" in the state for at least one year before he could be declared a resident

for tuition purposes neither violates the due process, equal protection, or privileges and immunities clauses of either the State or Federal Constitution, nor does it violate the commerce clause of the Federal Constitution. The constitutionality of charging nonresident students higher tuition fees than those charged residents has also been recently upheld by the Court of Appeals of Oregon.[10]

In another case, an alien, attending the University of Colorado first under a student visa and later on an immigrant visa, was refused certification by the University as an in-state student for tuition purposes. The Colorado Court of Appeals[11] affirmed a lower court's order in favor of the student, since it was shown that he intended to establish a Colorado domicile and thus met the legal requirements.

A three-judge federal district court in Minnesota[12] held that the regulation of the Board of Regents of the University of Minnesota, which provided that no student is eligible for residence classification in the University for tuition purposes unless he has been a bona fide domiciliary of the state for at least one year, was neither arbitrary nor unreasonable. The court further declared that the regulation served a legitimate state interest and did not violate the equal protection clause of the Fourteenth Amendment. This case was affirmed by the United States Supreme Court[13] and thus substantiates the view that out-of-state tuition can legally be charged nonresident students.

The remaining question as to whether a student may be able to gain, for tuition purposes, a legal residence while in attendance has increasingly been the subject of court cases in recent years.

In Nebraska,[14] a statute requiring at least four months continuous residence, independent of attendance at a state college or university, before a student can be deemed to have established his domicile for tuition purposes, was held by the Supreme Court of that state to be a valid exercise of legislative power to classify and, therefore, does not violate constitutional guarantees.

The Supreme Court of North Carolina[15] upheld the reasonableness of a tuition regulation adopted by the Board of Trustees of the University of North Carolina which requires that, in order to be eligible for in-state tuition, a student must, in addition to being domiciled in North Carolina, be so domiciled while not in attendance at an institution of higher education for a six-month period. The court declared that such a requirement does not relate to basic constitutional rights and therefore is not subject to the most stringent constitutional test, namely, whether it is necessary to promote a compelling state interest but rather is to be tested by the less stringent equal protection test of whether such classification has a reasonable relation to the lawful purpose of the regulation.

Another state university residency requirement in North Carolina, stating that any student desiring in-state residence status for the purpose of admission be a domiciliary of the state and be so domiciled while not in attendance at an institution of higher education for a consecutive twelve-month period preceding the date of first enrollment or re-enrollment in such an institution in the state, was upheld as reasonable in order to assure that North Carolina students benefit from the operation of the State University. This requirement for residency was used as a basis for implementing the regulation of the Board of Trustees limiting the number of non-residents who may be admitted to the first class of the School of Medicine to fifteen (15) percent of the entire first year class.[16]

Another relevant case arose at the University of Colorado. There the Supreme Court of Colorado[17] held that married women who had in-state domicile were entitled to be classified as "in-state students" for tuition purposes at the University of Colorado, even though their husbands were classified as out-of-state students as a result of not remaining out of school for one year.

Two recent federal district court cases were handed down in which the legality of statutes defining a resident student for tuition purposes was not ruled upon since the plaintiffs lacked "standing to sue." In the first case, a student, who dropped out of the University of Idaho for the spring and summer terms and who had previously been classified as a non-resident for tuition purposes, was declared eligible for classification as a resident student since he had not been a student for the preceding six months and therefore had no standing to challenge the statute defining a resident student for tuition purposes.[18]

In the second case, a three-judge federal district court in Mississippi[19] refused to overturn the validity of a state statute classifying a student, for tuition purposes, as a non-resident unless he has resided in the state for at least one year before admission to a public institution of higher education. The court held that the student contesting the validity of the statute was not a Mississippi "resident" and therefore lacked standing. Thus, the merits of the case were not reached.

Several recent decisions have struck down statutes and regulations which create an irrebuttable presumption of non-residency for tuition purposes for those who were non-residents at the time of enrollment and who remain full-time students. These rulings lend weight to the speculation that all such statutes and/or regulations may ultimately be declared violative of the Fourteenth Amendment to the Federal Constitution.

The Supreme Court of Colorado[20] held unconstitutional a statute classifying a student as a non-resident for tuition purposes

unless he registers for eight or less hours per term or unless he shall have completed twelve continuous months of residence while not attending either a public or a private college in the state. The court upheld out-of-state tuition charged non-residents, but it declared that the statute prohibiting all full-time students who were not residents of Colorado before they attended college from ever contesting the presumption of non-residency for tuition purposes while they remained full-time students constituted invidious discrimination prohibited by the Fourteenth Amendment.

A New Mexico statute which was almost identical to the above mentioned Colorado statute was struck down as unconstitutional by a three-judge federal district court. That court declared that the statute created "an irrebuttable presumption that a student who first enrolled as a non-resident student remains a non-resident student for tuition purposes unless he undergoes the unreasonable and arbitrary burden of abandoning the major portion of a year's education. The classification thus created is unreasonable, arbitrary, and violates the due process and equal protection clauses of the Fourteenth Amendment...."[21]

A more recent decision concerning the residency status of students for tuition purposes, which potentially has the most far reaching implications for the future, was decided by a three-judge federal district court in Connecticut.[22] That court ruled that state statutes and university regulations based thereon, imposing higher student fees for non-residents at state schools and providing that the residency status of a student as established at the time of admission should be his status for the entire period of his attendance, were violative of the due process and equal protection clauses of the Fourteenth Amendment to the Federal Constitution. The court did not forbid out-of-state tuition for non-residents, but it declared that, once a student is eligible for residency status, he can no longer be frozen into the classification of "out-of-state student." This decision may well turn out to be a landmark case since the United States Supreme Court, on December 4, 1972, agreed to hear this case and to render a decision during this current term.[23]

It seems, in view of reported court decisions, that the constitutionality of non-resident tuition differences has been decided, and colleges and universities may charge higher tuition at state supported institutions for non-residents than for legal residents. However, in order to be classified as an in-state student, a student must reside in the state for a specified period of time, which may extend for the length of a full year. Apparently, the only issue which remains to be settled is whether a student can gain a legal residence while attending the college or university or must remain out of school and in the state for the specified period of time in order to obtain domiciliary status. This issue should be clarified by the forthcoming decision promised by the United States Supreme Court.

If the decision of the Connecticut Court is upheld, then this will lend impetus toward more uniformity of policies regarding tuition and public support for higher education. Otherwise, students could conceivably "shop around" for the state schools which have the lowest in-state tuition and simply obtain a legal residence and thus enjoy the lowest possible fees.

The age of majority as related to the legal residency status of a student can have still another ramification upon colleges and universities. It may well have the effect of injecting new life into many private institutions. If students are able to gain a domicile while attending college, then private schools will benefit where state law provides public funds to those institutions enrolling in-state students. This will especially benefit those institutions which attract a large portion of its student body from other states, since after the required residency period, usually one year or less, all out-of-state students at private schools will be eligible to be regarded as in-state students, and the institution or individual students can then receive state aid. The argument can be made that this may allow the institution to lower its fees and thus possibly attract more students. It may be further argued that, since the private schools can then attract more students and thus can relieve the state of providing their education, this will allow the state to use this savings to offer more scholarship aid to needy students.

IV. DORMITORY RESIDENCE REQUIREMENTS

Another ramification of the lowering of the age of majority is that of dormitory residence requirements. In recent years, rules requiring students to live in college dormitories have come under attack, and several important court decisions have resulted. It has been held that public colleges and universities may not require students to live in dormitories simply to increase the revenue of the housing system.[24] In a much publicized case in Louisiana,[25] rules requiring that students in state supported colleges and universities, with certain exceptions, be required to live and eat their meals in facilities provided by the institution were upheld and declared constitutional so long as there exists a valid relationship between the purpose and the rule. The students argued that the purpose of the rule was solely for financial reasons. However, the federal district court accepted the reasoning set forth in the defense of the rule which stressed the educational benefits to be derived as a result of the rule. This case was appealed to the United States Supreme Court[26] which refused to hear the case, thus upholding the decision of the lower court.

The case, which gives rise to speculation as to how dramatic an effect the lowering of the age of majority may have upon dormitory residency requirements and subsequent loss of revenue to the college, also occurred in Louisiana and was decided by the same judge who decided the above mentioned case which was upheld by the U.S. Supreme Court.

Although another question was present in this case, the issue which is pertinent to this paper concerns requiring students who have reached the age of majority to live in college dormitories. The court[27] held that a university regulation requiring students under 23 years of age to live on campus constituted an unconstitutional classification of students since there was no showing of a reasonable relationship between requiring 21 and 22 year old students (who had reached the age of majority in Louisiana) to live on campus and the university educational process. The validity of the "living and learning" concept was not ruled upon in the case; however, the court declared that, insofar as the implementation of that concept in the instance case requiring students of full legal majority and returning miliary veterans to live on campus, it was not reasonably related to the educational process.

In view of this holding, the question can legitimately be raised as to what would be the difference, if any, if the age of majority were 18 instead of 21, as was the fact in this case. Logic seems to imply that no difference can be made unless the living and learning concept can be proven related to age. Certainly, if this line of reasoning is accepted by the courts, then the effect of the lowering of the age of majority will be felt in this important aspect of housing. Since very few college students are below the age of 18, dormitory residence requirements in those states with an age of majority of 18 seem to be in jeopardy. This will confuse the problem already faced by many institutions whose dormitories are operating at below capacity and who are losing much needed revenue in the process. The burden upon the colleges will then be either to justify the living and learning concept by relating it to age or to make dormitory living so attractive that students will voluntarily seek to live in them rather than be coerced.

V. STUDENT RECORDS AND REPORTS TO PARENTS

Another ramification of the lowering of the age of majority is that which concerns student records and the release of information contained in those records to parents, guardians, and/or others. Institutions of higher education may not pry unnecessarily into the personal affairs of a student, and the college may not reveal to others information concerning its students, unless it has a proper basis for doing do. Although a student may sign a release when he gives the school information, he does not necessarily release it for for all purposes. Certain parts of a student's record are confidential, and unless there is an "overriding legitimate purpose" or a "need to know," then such items are not intended to be disclosed without specific authorization.

Traditionally, many colleges regularly mail grade reports to parents. In addition, many colleges notify parents if the student is involved in any disciplinary action. If students legally hold

adult status at age 18, then there seems to be no legal justification for the disclosure of such information to parents or guardians unless permission is granted by the student for such disclosure.

Another aspect of reports to parents concerns information which may be obtained in counseling sessions or in the student health services center. Information acquired in a counseling or health center relationship may be deemed necessary for parents of minors to know, but such would not be the case for an adult. The lowering of the age of majority to 18 will eliminate much of the reporting which now is done to parents. Since the college will for all practical purposes be dealing with an adult student body, the continued efforts bordering upon "in loco parentis" in respect to student records and reports to parents or guardians will be unnecessary if not illegal.

VI. FINANCIAL SUPPORT FOR STUDENTS

If most of the students are legal adults, then there would be additional ramifications in the area of financial aid. Instead of looking at the total ability of the family to pay for the education of the student, the student may, in many instances, be the only one to consider. In those cases, instead of using an instrument such as the Parents' Confidential Statement as a prime basis for determining financial aid, another form such as the Student's Financial Statement can be used.

In attempting to determine the financial independence of a student, the institution may use the tax dependency of the student in relation to the parent as one criterion for such determination. If the parents claim the student as a dependent insofar as their income tax is concerned, then the college might insist that the student is indeed not financially independent. This is certainly a fertile field for further judicial determinations.

The lowering of the age of majority can probably be expected to lend more impetus toward many students exerting their financial independence as well as some parents encouraging this move. The number of these students and parents may be small but it seems that the impetus and momentum is toward an increase in the number of those persons.

The age of majority may have ramifications for higher education in an indirect way insofar as parental support for students are concerned in divorce and separation cases. In these cases, the courts have been quite willing to order parents to contribute, if they are financially able, toward the college education of their children, since in recent years this education has increasingly come to be regarded as a necessity for which a parent can be held financially responsible.

There have been recent decisions in which the courts have ruled that parents are not necessarily required to contribute toward the college education of children who have reached the age of majority. One such case occurred in North Carolina where the Court of Appeals[28] of that state held that children over 18 and attending college could not properly be classified as minor or dependent in the absence of any finding that they were insolvent, unmarried, and physically or mentally incapable of earning a livelihood. Therefore, an order could not properly be entered providing for this support and other payments for their benefit. In a similar case, the Supreme Court of Washington[29] ruled that a divorced father could not be directed to provide for his minor child's college expenses beyond the age of 21. Following that same line of reasoning, the Court of Appeals of Louisiana[30] most recently declared that, while the obligation to educate (including college) minor children is contracted by the parents by the very act of marrying, such obligation is not obsolete once the age of majority has been reached.

An interesting case was decided recently by the Supreme Court of Oklahoma.[31] There the state legislature had raised the age of majority from 18 to 21 insofar as provisions for the support and education of females are concerned. Therefore, the court ruled in a child support case that a father was liable for contributions toward the educational support of his daughter after age 18.

A parent who supports an emancipated child's college education has the right to attach stipulations to that support in order that it be continued. This is exemplified by a New York case which gained considerable national publicity. In that case, the father insisted that his daughter, who was attending an out-of-state college, live in a dormitory or return home. The Court of Appeals of New York[32] ruled that the father did not act unreasonably or capriciously in insisting that his 20 year old daughter take up residency in a dormitory or return to New York and that he was not required to continue to support her when she refused to do so. The court declared:

> "It is the material right, as well as the legal duty, of a parent to care for, control and protect his child from potential harm whatever the source and absent a clear showing of misfeasance, abuse or neglect, courts should not interfere with that delicate responsibility.... The father has the right in the absence of caprice, misconduct or neglect, to require that the daughter conform to his reasonable demands. Should she disagree, and at her age that is surely her prerogative, she may elect not to comply; but in so doing she subjects herself to her father's lawful wrath. Where, as here, she abandons her home, she forfeits her right to support."

It remains to be seen how great an effect the lowering of the age of majority might have upon parental financial support for students. Future court decisions will no doubt continue to delineate the responsibilities of students, parents, and society in regard to financing the college education of students.

VII. TORT LIABILITY

The area of tort liability may have several ramifications affecting higher education if the age of majority is lowered. Adult students are responsible for their own actions and can sue and be sued. Without involving the parents in the case, the college is free to press charges against a student who damages property or in any way commits a tort against the institution. Students will thus be forced to accept more responsibility for their actions on campus including the use of college facilities and for publications which may be libelous.

On the other hand, if students are adults, it may well be that they would be more inclined to press charges against the institution and/or other students when they believe their rights have been violated. One example of such action is where the institution is disrupted and possibly closed as a result of action by militants. Also, adult students may be more prone to press charges against a professor who has allegedly graded him arbitrarily or unfairly or who may have misused the classroom. This is not to say that all students are apt to file a court suit when they reach the age of majority, but since they will then be clothed with the responsibilities which attach to this status, then they will in all likelihood be more zealous of their rights.

VIII. CAMPUS ACTIVITIES

There are numerous campus activities which may be affected indirectly as a result of the lowering of the age of majority. Adult students are less likely to accept without question many of the rules, regulations, and restrictions surrounding any activity on campus. Since students will in all probability be more concerned with their finances, they probably will be more apt to question such things as a uniform activity fee or an athletic fee. They will probably ask for a kind of "cash and carry" approach to such things as athletic contests, student publications, and other campus activities which have traditionally received funds derived from a uniform student activity fee.

Since more students are being named to various governing boards, committees, and other panels, then campus rules such as those regarding alcoholic beverages may come in for additional scrutiny. In the area of academics, adult students will be more likely to question any course or requirement which they may not perceive as a valid prerequisite to the program necessary to achieve their objective.

Almost any campus activity seems to be affected indirectly by the lowering of the age of majority. A new awareness of adulthood on the part of students will tend to force the concept of accountability for the required expenditure of any funds or efforts on the part of students.

IX. CONCLUSION

Whatever ramifications the age of majority may hold for higher education, it is hoped that both students and the institution will perceive those circumstances as opportunities for progress. Once the new roles of each party are recognized and accepted, the energies of all may then be directed toward the true aims and purposes of the institution as well as the individual in order that he may progress to the fullest extent of his capacity and potential. Hopefully, old restraints and hindrances to those goals may be cast aside in order that real progress can be achieved in building a better society.

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FOOTNOTES

1. Black's Law Dictionary, Fourth Edition, West Publishing Co., St. Paul, Minnesota (1957).

2. Ibid.

3. This concept was first enumerated by the court in Gott v. Berea College, 161 S.W. 204 (1913) when it stated "College authorities stand in loco parentis concerning the physical and moral welfare and mental training of the pupils, and we are unable to see why, to that end, they may not make any rule or regulation for the government or betterment of their pupils that a parent could for the same purpose. Whether the rules or regulations are wise or their aims worthy is a matter left solely to the discretion of the authorities or parents, as the case may be, and, in the exercise of that discretion, the courts are not disposed to interfere, unless the rules and aims are unlawful or against public policy."

4. Almost all of the cases decided relative to students and their constitutional rights have a bearing upon the concept of in loco parentis. Representative cases which strike at the validity of that doctrine include the following: Dixon v. Alabama State Board of Education, 294 F. 2d 150 (1961); Goldberg v. Regents of University of California, 57 Cal. Rptr. 463 (1967); Moore v. Student Affairs Committee of Troy State University, 284 F. Supp. 725 (1968); Tinker v. Des Moines Independent Community School District, 393 U.S. 503 (1969); Esteban v. Central Missouri State College, 415 F. (2d) 1077 (1969); Norton v. Discipline Committee of East Tennessee State University, 419 F. (2d) 195 (1969); Scoggin v. Lincoln University,291 F. Supp. 161 (1968); Hammond v. South Carolina State College,272 F. Supp. 947 (1967); Dickey v. Alabama State Board of Education, 273 F. Supp. 613 (1967); Bayless v. Martine, 430 F. (2d) 873 (1970); Sword v. Fox, 446 F. (2d) 1091 (1971); Healy v. James, 92 S. Ct. 2338 (1972).

5. Lewis B. Mayhew, "Higher Education -- Toward 1984," Educational Record, Summer, 1972, pp. 215-221.

6. Black's Law Dictionary, Fourth Edition, West Publishing Co., St. Paul, Minnesota (1957).

7. Ibid.

8. Although there may be exceptions, it is the general rule that minors retain the same domicile as their parents, unless they are legally adopted by an adult in which case their domicile would then be that of the adopted parent.

9. Arizona Board of Regents v. Harper, 495 P. 2d 453 (1972).

10. West v. Bowers, 502 P. 2d 270 (1972).

11. Seren v. Douglas, 489 P. (2d) 601 (1971).

12. Starnes v. Malkerson, 326 F. Supp. 234 (1970).

13. Starnes v. Malkerson, 401 U.S. 985 (1971).

14. Thompson v. Board of Regents of University of Nebraska, 188 N.W. (2d) 840 (1971).

15. Glusman v. Trustees of the University of North Carolina, 190 S.E. (2d) 213 (1972).

16. Fox v. Trustees of Consolidated University, 190 S.E. (2d) 884 (1972).

17. Kirk v. Douglas, 489 P. (2d) 201 (1971).

18. Orwick v. State Board of Education, 388 F. Supp. 739 (1972).

19. Cheek v. Fortune, 341 F. Supp. 729 (1972)

20. Covell v. Douglas, 501 P. (2d) 1047 (1972).

21. Robertson v. Regents of the University of New Mexico, F. Supp. (1972).

22. Kline v. Vlandis, 346 F. Supp. 526 (1972)

23. 41 L.W. 3305 (1972).

24. Mollere v. Southeastern Louisiana College, 304 F. Supp. 826 (1969).

25. Pratz v. Louisiana Polytechnic Institute, 316 F. Supp. 872 (1970).

26. Pratz v. Louisiana Polytechnic Institute, 28 L. Ed. 541 (1971).

27. Cooper v. Nix, 343 F. Supp. 1101 (1972).

28. Choate v. Choate, 189 S.E. (2d) 647 (1972).

29. Baker v. Baker, 498 P. (2d) 315 (1972).

30. Fellows v. Fellows, 267 So. (2d) 572 (1972).

31. Irby v. Martine, 500 P. (2d) 278 (1972).

32. Roe v. Doe, 272 N.E. (2d) 567 (1971).

Member Associations

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Conference of Jesuit Student Personnel Administrators (CJSPA)

College Placement Council (CPC)

National Association of Student Financial Aid Administrators (NASFAA)

National Association of Women Deans and Counselors (NAWDC)